

Vicki Aznaran

19 May 1994

I, VICKI J. AZNARAN, hereby declare as follows:

1. I am over 18 years of age and a resident of the State of Texas. I have personal knowledge of the matters set forth herein and, if called upon to do so, could and would competently testify thereto.
2. From 1972 until 1987, I was a member of various Church of Scientology ("Church") entities. During that time I held a number of important positions in the corporate and ecclesiastic hierarchy of the Church.
3. Religious Technology Center ("RTC") is the owner of the trade secret rights in certain confidential scriptures of the Scientology religion referred to collectively as the Advanced Technology or the "Upper Level Materials." These confidential materials are commonly known individually as Power, SOLO Course, R6EW, Clearing Course, OT I - OT VIII and several higher OT levels which to my knowledge have not yet been released. Training in these highly confidential scriptures is available only in certain Churches of Scientology and only to Scientologists who have completed the required levels of, spiritual training which, as a matter of ecclesiastic doctrine, are a prerequisite to accessing the Advanced Technology. The Upper Level Materials are trade secrets and are treated as such. RTC and the Churches which offer the services based upon these confidential religious writings go to great lengths to protect the secrecy and confidentiality of the Advanced Technology. They are kept under lock and key and the copies of the materials are numbered and monitored through a logging system to ensure that only Scientology parishioners who have attained the requisite level of spiritual awareness are allowed access to the Upper Level Materials. Even then, such parishioners do not gain access to these scriptures until they have signed secrecy and confidentiality agreements. Moreover, parishioners who have access to these materials are not permitted to copy them, make notes from them, or remove them from designated rooms.
4. The Advanced Technology is otherwise not available to anyone. Thus, as to any version of any of the scriptures that comprise the Advanced Technology, if the material in question is in anyone's hands other than pursuant to the prescribed procedures, it must either have been stolen or otherwise misappropriated in violation of a covenant of confidentiality.
5. RTC and the Church take special care to protect and enforce its intellectual property and trade secret rights and to prosecute any theft, infringement, or unauthorized disclosure of the Upper Level Materials. When I was President of RTC information came to my attention which implicated David Mayo in the receipt of certain of the Upper Level Materials stolen from a Church in Denmark. That information led to the filing of the consolidated cases called Religious Technology Center v. Scott, et al. and Religious Technology Center v. Wollersheim, et al., Nos. CV 85-711 and CV 85-7197 were filed against David Mayo and others in the United States District Court for the Central District of California ("the consolidated cases").
6. After I left the Church, I met with Jerold Fagelbaum, one of the attorneys for David Mayo in the consolidated cases, in late June or early July 1988 when he came to Dallas to gather information from me that would be of use to him in the litigation with RTC and the other Church plaintiffs. I have also executed a declaration for Mr. Fagelbaum's use in the consolidated cases in October of 1988 and have had my deposition taken in the consolidated cases. At no time in my interview with Mr. Fagelbaum, or in any of the above testimony -- or at any other time -- did I claim to have seen any handwritten manuscripts of those portions of the Upper Level Materials stolen in Denmark. What I did testify to is that I had seen the original version of these materials. They were all in typed form. Some of the typed originals had some minor handwritten notations on them. I never saw any original version of these materials which was handwritten by anyone let alone David Mayo.
7. However, I see from reviewing documents in the consolidated cases, that on several occasions Mr. Fagelbaum has argued that I had seen such handwritten manuscripts. This just is not true. Mr. Fagelbaum has also argued several times that I knew that materials from Mr. Hubbard's spiritual counseling folders were used in the creation of New Era Dianetics for Operating Thetans. This is also not true and I never told that to Mr. Fagelbaum, nor testified to such a fact. The truth is that I saw the original versions of these materials and the information which

Mr. Hubbard used to create them. I never saw anything that would have come from Mr. Hubbard's spiritual counseling folders.

a. Mr. Fagelbaum has also argued that I said that the Church was engaged in massive document destruction in order to give the impression that documents related to this case were destroyed. I never said that. During the time I was President of RTC, we fully complied to all discovery requests. I have never received an order from David Miscavige, Norman Starkey or Lyman Spurlock to destroy any documents related to litigation and I have no reason to believe that the Church would destroy any documents related to the consolidated cases, especially regarding the authorship of the New Era Dianetics for Operating Thetans materials. All the documents I saw relating to the authorship of these materials showed that L. Ron Hubbard was the author and not David Mayo. I can see from Mr. Fagelbaum's arguments and papers that he created the impression that documents related to this case were destroyed in order to win the case, and that he used my testimony entirely unrelated to this matter as the prime support and corroboration of this false claim. He has misinterpreted what I said, and taken my testimony entirely out of context, as I never alleged any such thing, and in fact know the opposite to what he has argued is the truth.

I declare under the penalty of perjury under the laws of the United States of America, and under the laws of each individual state thereof, including the laws of the states of California and Texas, that the foregoing is true and correct.

Executed this 19th day of May, 1994 in Dallas, Texas.

Vicki Aznaran

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